

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Paul Tasain THOMAS

Case No. Case: 2:22-mj-30169
Assigned To : Unassigned
Assign. Date : 4/6/2022
USA V. THOMAS (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 14, and 22, 2022 in the county of St. Clair in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

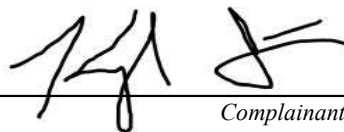
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 6, 2022

City and state: Detroit, Michigan


Complainant's signature

Special Agent Kyle Sise - ATF

Printed name and title


Judge's signature

Honorable Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Kyle Sise, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent (“SA”) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since November 2016. I am currently assigned to the Detroit Field Division. I am a graduate of the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia.

2. As an ATF Special Agent, I have participated in numerous federal investigations as well as authored federal search warrants, federal criminal complaints, and federal arrest warrants. Prior to becoming an ATF Special Agent, I was a law enforcement officer for approximately seventeen years in Detroit, Michigan.

3. I have personal knowledge or have been provided by other law enforcement officers with the facts set forth herein. I have not included each and every fact known to me concerning this investigation; rather I have set forth only the facts necessary to establish probable

cause Paul Tasain THOMAS (B/M, xx/xx/1983) violated Title 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

II. PROBABLE CAUSE

4. Probable cause has been established from records, reports, surveillance, and information provided by an ATF Confidential Informant (ATF-1) and other sworn federal and state law enforcement officers. The following information summarizes the events that establish probable cause for the requested criminal complaint and arrest warrant and do not encapsulate the criminal investigation.

5. In February 2022, ATF obtained information from ATF-1 that an individual named “Paul” was in possession of several firearms and was attempting to sell the firearms. ATF Agents identified Paul Tasain THOMAS (“THOMAS”) as the individual who is unlawfully possessing and selling firearms in and around Port Huron, Michigan. ATF Agents obtained a possible telephone number for THOMAS. I searched this telephone number in a database and found a possible subscriber of the telephone number to be THOMAS, with an address in Port Huron, Michigan.

6. I utilized the information and obtained a Michigan State Police (“MSP”) image system record photo of THOMAS. I utilized law enforcement databases and found an individual by the name of Paul Tasain THOMAS with a criminal record in Michigan. A review of THOMAS’s criminal history revealed the below listed felony convictions:

- 2006 – Felony, Police Officer – Assaulting/ Resisting/ Obstructing, 31st Circuit Court, CFN: 740600335501
- 2008 – Felony, Domestic Violence and/or Knowingly Assaulting a Pregnant Individual – 3rd Offense, 31st Circuit Court, CFN: 07P10215FY
- 2014 – Felony (Attempt), Uttering and Publishing, 31st Circuit Court, CFN: 14-002167-FH
- 2016 – Felony, Operating While Intoxicated/ Impaired – 3rd Offense, 31st Circuit Court, CFN: 16-000029-FH

First and Second Controlled Firearm Purchases by ATF-1

7. On February 11, 2022, THOMAS entered ATF-1’s place of employment in Port Huron, Michigan. THOMAS engaged ATF-1 in conversation and advised that he had a firearm for sale. To show ATF-1

the firearm, THOMAS placed a Taurus, model PT 111 G2 (Millennium G2), 9mm semi-automatic pistol (TJU39120) on the counter. THOMAS left with his pistol.

8. On February 13, 2022, THOMAS contacted ATF-1 via phone and confirmed a meeting on February 14, 2022 for ATF-1 to purchase firearms from THOMAS.

9. On February 14, 2022, THOMAS contacted ATF-1 via phone and advised ATF-1 to meet THOMAS at 15th Street and Howard Street in Port Huron, Michigan.

10. A short time later, ATF Agents met ATF-1 at a predetermined meet location. Prior to any transactions, ATF-1 and ATF-1's vehicle was searched for contraband with none being located.

11. After the search of ATF-1, ATF Agents followed ATF-1 to 15th Street and Howard Street in Port Huron, Michigan. ATF-1 met THOMAS at this location and THOMAS entered ATF-1's vehicle. During this controlled purchase, ATF-1 purchased one (1) Ruger (Sturm Ruger), model SR40C, .40 caliber semi-automatic pistol (34327856) with a magazine from THOMAS in exchange for \$700 in prerecorded government funds. The purchase was audio and video recorded.

12. A short time later, THOMAS and ATF-1 communicated via telephone and agreed to meet at the Marathon Gas Station, located at 1301 Military Street in Port Huron, Michigan. This meeting was for a controlled purchase of a second firearm.

13. ATF Agents followed ATF-1 to the Marathon Gas Station, located at 1301 Military Street in Port Huron, Michigan. ATF-1 met THOMAS at this location and THOMAS entered ATF-1's vehicle. During this controlled purchase, ATF-1 purchased one (1) Taurus, model PT 111 G2 (Millennium G2), 9mm semi-automatic pistol (TJU39120) with a magazine from THOMAS in exchange for \$700 in prerecorded government funds. The purchase was audio and video recorded.

14. After the second controlled purchase, ATF Agents followed ATF-1 to a predetermined meet location. I took possession of the two (2) above-mentioned firearms. Both firearms were previously reported stolen. ATF-1 and ATF-1's vehicle were searched for contraband with none being located.

Third Controlled Firearm Purchase by ATF-1

15. On February 21, 2022, THOMAS entered ATF-1's place of employment in Port Huron, Michigan. THOMAS removed a Taurus, model G2C, 9mm semi-automatic pistol from his hooded sweatshirt and handed it to ATF-1. THOMAS left with his pistol.

16. On February 22, 2022, ATF Agents met ATF-1 at a predetermined meet location. Prior to any transactions, ATF-1 and ATF-1's vehicle was searched for contraband with none being located.

17. A short time later, ATF-1 contacted THOMAS via telephone and confirmed the scheduled controlled purchase from THOMAS. THOMAS advised ATF-1 to meet THOMAS at 11th Street and Howard Street in Port Huron, Michigan.

18. ATF Agents followed ATF-1 to 11th Street and Howard Street in Port Huron, Michigan. ATF-1 met THOMAS at the above location and THOMAS entered ATF-1's vehicle. During this controlled purchase, ATF-1 purchased one (1) Taurus, model PT 111 G2A (G2C), 9mm semi-automatic pistol (1C058653) with a magazine from THOMAS in exchange for \$750 in prerecorded government funds. The purchase was audio and video recorded.

19. After the third controlled purchase, ATF Agents followed ATF-1 to a predetermined meet location. I took possession of the above-mentioned firearm. Per a records check, the Taurus, model PT 111 G2A (G2C), 9mm semi-automatic pistol (1C058653) was purchased three (3) days prior on February 19, 2022, by Joshua VANCAMP (W/M, xx/xx/1989). ATF-1 and ATF-1's vehicle were searched for contraband with none being located.

20. I conferred with ATF Special Agent Joshua McLean, an Interstate Nexus expert, who indicated the Ruger (Sturm Ruger), model SR40C, .40 caliber semi-automatic pistol (34327856), Taurus, model PT 111 G2C (Millennium G2), 9mm semi-automatic pistol (TJU39120), and the Taurus, model PT 111 G2A (G2C), 9mm semi-automatic pistol (1C058653) were manufactured outside of the State of Michigan and therefore, traveled in or affected interstate or foreign commerce.

III. CONCLUSION

21. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that on February 14, 2022, and February 22, 2022, within the Eastern District of Michigan, Paul Tasain THOMAS, knowing that he was previously

convicted of a crime punishable by more than one year of imprisonment,
possessed firearms, in violation of Title 18 U.S.C. § 922(g)(1).



Kyle Sise, Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: April 6, 2022